

EXHIBIT C

**U.S. Department of Justice***United States Attorney**District of Delaware*

*The Hercules Building
1313 N. Market Street, Suite 400
P. O. Box 2046
Wilmington, Delaware 19899-2046*

*(302) 573-6277
FAX (302) 573-6220*

June 3, 2025

BY CERTIFIED MAIL

LaKresha Moultrie, Secretary of Labor
Delaware Department of Labor
4425 North Market Street
Wilmington, Delaware 19802

Re: Immigration Enforcement Subpoena Number HSI-WM-2025-048065-001

Dear Ms. Moultrie:

This Office has been asked to commence legal action against the Delaware Department of Labor in the United States District Court for the District of Delaware to compel the full compliance with Department of Homeland Security Immigration Enforcement Subpoena Number HSI-WM-2025-048065-001 dated April 7, 2025. This subpoena was served electronically via Egress (the same way other subpoenas from the Department of Homeland Security are served). To date, the required records have not been produced. A copy of the subpoena is attached.¹

If legal action is commenced, the Delaware Department of Labor will be required to appear in court, and may be held in contempt for failure to obey any forthcoming court order.

You may avoid the necessity of such legal action by contacting Special Agent Kimberly Caraway via email at Kimberly.A.Caraway@ice.dhs.gov, and by complying with the subpoena by **June 20, 2025**.

Very Truly Yours,

SHANNON T. HANSON
Acting United States Attorney

/s/ Claudia L. Pare
Claudia L. Pare
Assistant United States Attorney

Attachment

¹ Three other Immigration Enforcement Subpoenas were served on the Delaware Department of Labor on February 3, 2025 (HSI-WM-2025-0297541-001), February 7, 2025 (HSI-WM-2025-032366-001), and March 4, 2025 (HSI-WM-2025-038995-001). The required records have not been produced in response to these subpoenas either.

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U.S. Department of Justice
United States Attorney's Office
District of Delaware
1313 North Market Street, Suite 400
P.O. Box 2046
Wilmington, DE 19899-2046
Official Business

LaKresha Moultrie, Secretary of Labor
Delaware Department of Labor
4425 North Market Street
Wilmington, Delaware 19802

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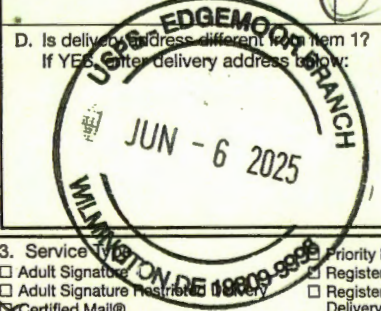
Sent 1

Street LaKresha Moultrie, Secretary of Labor
Delaware Department of Labor
4425 North Market Street
City, S Wilmington, Delaware 19802

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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<p>1. Article Addressed to:</p>	<p>B. Received by (Printed Name) C. Date of Delivery</p>		
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